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June 17, 1997

By Hand

Mr. William F. Caton
Secretary
Federal Communications Commission
1919 M Street, N.W.
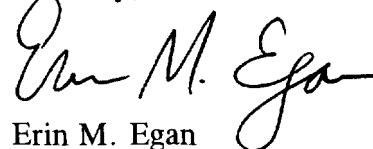Washington, D.C. 20554

   Re: **In the Matter of Advanced Television Systems and Their Impact
         Upon the Existing Television Broadcast Service, MM Docket No. 87-268**

Dear Mr. Caton:

        On Friday June 13, 1997, we filed a Petition for Partial Reconsideration
of WTNH Broadcasting, Inc., K-W TV, Inc., Post-Newsweek Stations, Connecticut,
Inc. and Tribune Broadcasting Company in the above-captioned proceeding. We are
enclosing two substitute pages to correct a typographical error in one of the headings in
the petition (I.B.4.) and one substitute page to correct a small error on page 5 of
Appendix C. Please substitute the attached pages with the respective pages of the
pleading.

        Should there be any questions concerning this matter, please contact the
undersigned.

                                        Sincerely,

                                        Erin M. Egan

Enclosures

WNJB, New Brunswick, NJ	NTSC-58	12
WMBC-TV, Newton, NM	NTSC-63	6
WRNN-TV, Kingston, NY	NTSC-62	3

Figure 6 is the map for WBNE's proposed DTV operation on channel 6. The outline of the noise limited (28 dBu) contour for WBNE's DTV operation is shown, along with regions of calculated service and interference. The following stations are predicted to cause interference within the WBNE DTV noise limited contour:

Call/Location	NTSC/DTV Channel	Interference Area (sq. km)
WTIC-TV, New Haven, CT	DTV-5	15
WLNE-TV, New Bedford, MA	NTSC-6	3,650
WCSH, Portland, ME	NTSC-6	12
WRGB, Schenectady, NY	NTSC-6	2,050
WPVI-TV, Philadelphia, PA	NTSC-6	265

As indicated, the majority of the interference is from the co-channel NTSC operations of WLNE-TV and WRGB on channel 6. Figure 7 depicts the WBNE DTV service and interference with consideration given to interference from WLNE-TV's existing NTSC operation on channel 6, only. The WLNE-TV interference area consists of 3,650 square kilometers containing an estimated population of 422,000 persons. As shown on Figure 7, the interference from WLNE-TV will be located almost entirely within the eastern portion of the WBNE DMA in the Connecticut counties of Tolland, Windham and New London.

Figure 8 depicts the WBNE DTV service and interference with consideration given to interference from WRGB's existing NTSC operation on channel 6, only. The WRGB interference area consists of 2,050 square kilometers containing an estimated population of 293,000 persons. As shown on Figure 8, some of the interference

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11 noise limited coverage contour containing an estimated population of 776,000 persons.[17]

Taking into account use of indoor antennas by viewers receiving WFSB's signal, however,

the interference to WFSB DTV Channel 11 will be much greater. The 2,904 square

kilometers level of interference assumes the use of outdoor (directional) receiving antennas

which discriminate against (i.e., ignore) interference from any direction other than the exact

direction of the transmitting antenna.[18] In this congested urban area, however, reception on

indoor antennas is the norm. And, as the Stielper Analysis indicates, the predicted

interference to WFSB increases where viewers are expected to use indoor antennas. Indeed,

the Stielper Analysis demonstrates that, assuming the use of indoor antennas, interference

from WPIX NTSC Channel 11 to WFSB DTV Channel 11 will extend almost to WFSB's

NTSC Grade A contour.[19]

> 4. **The separation between the transmitters of WFSB (Hartford) DTV Channel 11 and WTNH-TV (New Haven) DTV Channel 10 is problematic.**

The Sixth R&O assigns DTV Channel 11 to WFSB (Hartford) while also

assigning DTV Channel 10 to WTNH-TV (New Haven) which is located 40.94 square

kilometers from the WFSB site.[20] The separation is problematic because the stations, which

are licensed to different cities in the same television market, cannot simply be collocated. If

WTNH-TV DTV Channel 10 were to use WFSB's site, its signal would be obstructed by

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[17] Lundin Analysis at 6. The two stations are separated by only 155.5 kilometers (96.6 miles). See Stielper Analysis at 2.

[18] Stielper Analysis at 4.

[19] Id.

[20] Sixth R&O, Appendix B; Stielper Analysis at 5.